

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

CELSIUS NETWORK LLC, *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)  
) Case No. 22-10964 (MG)  
)  
) (Jointly Administered)  
)

**STIPULATION REGARDING THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS' RULE 2004 DISCOVERY REQUESTS**

Celsius Network LLC, together with the above-captioned debtors and debtors in possession (the “Debtors”), and the Official Committee of Unsecured Creditors (the “Committee” and together with the Debtors, the “Parties”), by and through their respective counsel, hereby enter into this stipulation regarding the Committee’s pending and future discovery requests served pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (the “Rule 2004 Discovery”).

**RECITALS**

**WHEREAS**, on July 13, 2022, the Debtors filed voluntary petitions commencing the above-captioned cases (these “Chapter 11 Cases”) under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”);

**WHEREAS**, on July 27, 2022, the United States Trustee for Region 2, pursuant to Section 1102(a) of the Bankruptcy Code, appointed the Committee in these Chapter 11 Cases;

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey 07030.

**WHEREAS**, one of the Committee's core purposes is to investigate the facts and circumstances surrounding the filing of these Chapter 11 Cases;

**WHEREAS**, the Committee has served Rule 2004 Discovery on the Debtors and has informed the Debtors that it intends to serve additional Rule 2004 Discovery in due course;

**WHEREAS**, in the interest of preserving estate resources and aiding the successful resolution of these Chapter 11 Cases, the Debtors have agreed to reasonably cooperate in the Committee's investigation, including the Rule 2004 Discovery;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:**

1. The Debtors agree to accept service of the Rule 2004 Discovery without requiring that the Committee seek leave to pursue the Rule 2004 Discovery from the Bankruptcy Court.
2. In response to the Rule 2004 Discovery, the Debtors will work with the Committee regarding the requests and will provide written responses and document productions on a rolling basis as soon as reasonably possible.
3. Except as expressly set forth herein, the Parties' rights in connection with the Rule 2004 Discovery, and to seek other or further information or discovery, shall be preserved.

Dated: August 26, 2022  
New York, New York

/s/ Judson Brown, P.C.

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